

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO ETHICON WAVE 3 MOTIONS</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**DEFENDANTS' MOTION TO EXCEED PAGE LIMITATION**

Defendants Ethicon, Inc. and Johnson & Johnson respectfully request that the Court afford them leave to exceed slightly the 20-page limitation set forth in Local Rule 7.1(a)(2), as it relates to the memorandum of law supporting their forthcoming motion to limit the general opinions of Dr. Jerry Blaivas. As support for this motion, Defendants submit that there are many aspects of Dr. Blaivas's opinions that are subject to challenge, including as it relates to his opinions reflected in a review article that he very recently co-wrote with Dr. Vladimir Iakovlev and others.

Defendants do not intend to re-hash old arguments that the Court has previously rejected or to present unnecessarily verbose argument. Defendants, nevertheless, feel constrained in their ability to present all the grounds for Dr. Blaivas's exclusion in a 20-page brief, they feel that it is important to set forth these grounds in detail, and they believe that the Court will benefit from a comprehensive assessment of these grounds. Defendants would further note that, because this matter involves a consolidation of many cases and Dr. Blaivas has prepared several general reports on multiple products, a particularly detailed brief is warranted. For all of these reasons,

Defendants submit that they have presented good cause for relief from the page limitation requirement and respectfully request that the Court allow them to present a 22-page brief.

Respectfully Submitted,

/s/ Christy D. Jones

Christy D. Jones  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4523  
[Christy.jones@butlersnow.com](mailto:Christy.jones@butlersnow.com)

/s/ David B. Thomas

David B. Thomas (W. Va. Bar #3731)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 25338  
(304) 414-1807  
[dthomas@tcspllc.com](mailto:dthomas@tcspllc.com)

Counsel for Defendants Ethicon, Inc. and  
Johnson & Johnson

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL No. 2327</b>
<b>THIS DOCUMENT RELATES TO ETHICON WAVE 3 CASES</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

CERTIFICATE OF SERVICE

I, Christy D. Jones, certify that on this date, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ Christy D. Jones

Christy D. Jones  
Butler Snow LLP  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4523  
christy.jones@butlersnow.com